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June 2, 2005

DOCKET FILE COPY ORIGINAL

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Portals II - 12th Street Lobby
Filing Counter - TW-A325
445 12th Street, SW
Washington, D.C. 20554

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JUN - 2 2005

Federal Communications Commission
Office of Secretary

Re: MM Docket No. 05-10
RM-11140, 11241
(Monument, Prairie City, Prineville and Sisters
Oregon and Weiser, Idaho)
Reply Comments

Dear Ms. Dortch:

Transmitted herewith, on behalf of Portland Broadcasting, LLC, M.S.W. Communications, LLC, Columbia Gorge Broadcasting, Inc. and Extra Mile Media, Inc., is an original and four (4) copies of their Reply Comments in MM Docket No. 05-10. Please contact undersigned counsel in the event the Commission has any questions with respect to this filing.

Sincerely,



Lee J. Peltzman

Counsel for

PORTLAND BROADCASTING, LLC

Enclosure

No. of Copies rec'd 0+4
List ABCDE

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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JUN - 2 2005

**Federal Communications Commission
Office of Secretary**

| | | |
|---|---|---------------------|
| In the Matter of |) | |
| |) | |
| Amendment of Section 73.202(b) |) | MM Docket No. 05-10 |
| Table of Allotments |) | RM-11140, 11241 |
| FM Broadcast Stations |) | |
| (Monument, Prairie City, Prineville and |) | |
| Sisters, OR and Weiser, ID |) | |

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

REPLY COMMENTS

Portland Broadcasting, LLC, Columbia Gorge Broadcasting, Inc., M.S.W. Communications, Inc. and Extra Mile Media, Inc. (together, the "Joint Petitioners"), hereby file their Reply Comments in MB Docket No. 05-10 to the counterproposal of SSR Communications Incorporated ("SSR"). In support of their position, the Joint Petitioners state the following:


The SSR counterproposal was accepted by Commission Public Notice on May 18, 2005. See Report No. 2708. Joint Petitioners filed their own proposal in the form of a Petition for Rule Making on March 21, 2005, which proposed, *inter alia* that Channel 279C be reallocated from Lebanon to Paisley, Oregon, as that community's first local aural service and that Station KXPC-FM's license be modified to specify operation on Channel 279C at Paisley, Oregon. It appears that the SSR counterproposal in MB Docket No. 05-10 to assign Channel 280C to Monument, Oregon conflicts with the Joint Petitioners' Petition for Rule Making seeking to reallocate Channel 279C to Paisley, Oregon. See Engineering Statement. As such, the Joint Petitioners Petition for

Rule Making should be accepted for filing as a valid counterproposal in MB Docket No. 05-10 and placed on a Supplemental Public Notice.

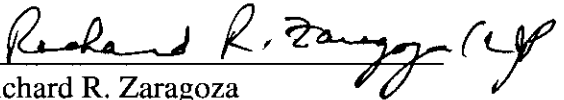
Respectfully submitted,

PORTLAND BROADCASTING, L.L.C.

M.S.W. COMMUNICATIONS, LLC

By: 

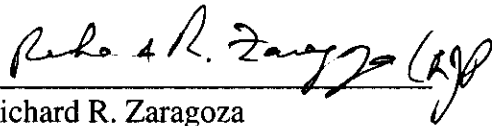
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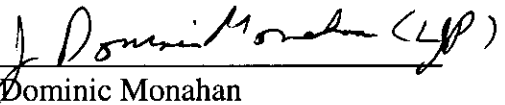
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COLUMBIA GORGE BROADCASTING, INC.

EXTRA MILE MEDIA, INC.

By: 

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By: 

J. Dominic Monahan
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Eugene, OR 97401

Dated: June 2, 2005

ENGINEERING STATEMENT

In Support of

Reply Comments

KXPC-FM Ch 279C Lebanon, OR
KACI (FM) Ch 249C2 The Dalles, OR
KMSW (FM) Ch 224C3 The Dalles, OR
KHPE (FM) Ch 300C Albany, WA
The Joint Parties

MB Docket 05-10, RM-11140

INTRODUCTION

On March 21st, 2005 this firm filed a petition for rule making for a group known collectively in the engineering statement as 'The Joint Parties.' Among other things, the parties sought to delete channel 279C at Lebanon, OR and allocate channel 279C to Paisley, OR. This move accommodated the use of channel 279C for channel 300C at Albany, OR (KHPE). Channel 300C was proposed to be substituted for channel 250C at the licensed site of KNRQ, Eugene, OR. The substitution of channel 300C for channel 250C at the licensed site of LNRQ allows KACI The Dalles, OR to change community of license to Tualatin, OR on its MX channel 250C2.

DISCUSSION

When The Joint Parties PRM was filed there were no conflicts in channel spacing that appeared in the Commission's database. However, it appears that SSR Communications, Inc. ("SSR") filed a counterproposal to the allotment of channel 266A at Monument, OR that included a request for the allotment of channel 280C at Monument. The Joint Parties had allotment studies conducted to determine if the SSR counterproposal was in conflict with its proposed allotment of channel 279C at Paisley for use by KXPC. When the allotment reference for channel 280C is inserted into the KXPC allocations study at Paisley it depicts that a prohibited short space is indeed created. This short space is 30.50

kilometers which is too significant to eliminate with a slight modification of reference coordinates.

The allotment reference for channel 279C at Paisley was carefully chosen to give the maximum service to a white area and 2,287 persons in the white area. In addition, it was chosen to guarantee line of sight to the community of Paisley. For The Joint Parties to modify its reference coordinates by 30.50 is impossible for the allotment of channel 279C at Paisley and therefore it eliminates the entire Joint Parties PRM.

The SSR counterproposal appeared in the Commission's filing data April 1st. Therefore the Joint Parties engineering firm has not had an opportunity to explore any options. It appears that line of sight limitations for channel 279C at Paisley greatly limit the ability to keep the channel 280C filing at Monument and channel 279C at Paisley from being mutually exclusive.

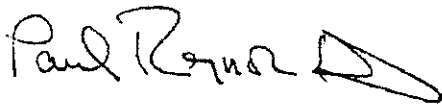
EXHIBIT

Exhibit E, Figure 1 is an allocation study for the allotment of channel 279C at Paisley. It uses the same reference coordinates as those used in The Joint Parties petition for rule making. In essence it is the same study as Figure 9 in the original petition. However, in this study the SSR proposal to allocate channel 280C at Monument is included. The study verifies that there is a MX situation between the two proposed allotments. The prohibited short space is 30.50 kilometers

CONCLUSION

The instant engineering study provides documentation that The Joint Parties' petition is inadvertently in conflict with a counterproposal that was filed in the Monument, OR NPRM of MB Docket 05-10, RM 1140. No engineering options are being advanced by the Joint Parties at this time. The instant study is only to advise the Commission that a conflict exists in the event that the Monument proceeding is MX with other filings and further comment periods are contemplated.

Respectfully Submitted,
REYNOLDS TECHNICAL ASSOCIATES, LLC.

A handwritten signature in black ink, appearing to read "Paul Reynolds", followed by a stylized flourish or checkmark.

Paul Reynolds, Manager

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ENGINEERING STATEMENT

In Support of

Reply Comments

KXPC-FM Ch 279C Lebanon, OR
KACI (FM) Ch 249C2 The Dalles, OR
KMSW (FM) Ch 224C3 The Dalles, OR
KHPE (FM) Ch 300C Albany, WA
The Joint Parties



MB Docket 05-10, RM-11140

ALLOCATIONS STUDY

Deleting Ch 279C Lebanon, OR and allotting Ch 279C Paisley, OR (KXPC)
(Depicting MX status with SSR Counterproposal in above captioned Docket)

| REFERENCE | | CLASS = C | | DISPLAY DATES | |
|--|-----------------|-------------------------|------------------|-----------------|---------------------|
| 42 56 23 N | | Current Spacings | | DATA 04-01-05 | |
| 120 13 14 W | | Channel 279 - 103.7 MHz | | SEARCH 04-05-05 | |
| Call | Channel | Location | Dist | Azi | FCC Margin |
| Community of Paisley | | | OR 38.06 | 224.2 | |
| Reference Coordinates: | | | | | |
| North Latitude: 42-41-38 | | | | | |
| West Longitude: 120-32-41 | | | | | |
| KXPCFM | CP -N 279C | Lebanon | OR 258.80 | 315.7 | 290.0 -31.20 |
| NEW | ADD 280C | Monument | OR 210.50 | 16.7 | 241.0 -30.50 |
| Of Concern: | | | | | |
| SSR Counterproposal for Ch 280C at | | | | | |
| Monument, OR at; | | | | | |
| NL: 44-45-00, WL: 119-28-40 | | | | | |
| NOTE: MX with Joint Parties PRM filed March 21st, 2005 | | | | | |
| KXPCFM | LIC 279C | Lebanon | OR 281.10 | 309.3 | 290.0 -8.90 |
| Of Note: | | | | | |
| Licensed and operating site (Form 302 on file) | | | | | |
| Of KXPC before proposed channel deletion at | | | | | |
| Lebanon and allotment at Paisley. | | | | | |
| Demonstrates allotment is MX with present KXPC | | | | | |
| authorized facilities. | | | | | |
| KHPE.P | LIC 279C | Albany | OR 309.98 | 308.7 | 290.0 19.98 |
| Of Note: | | | | | |
| Substitution of Ch 279C for Ch 300C | | | | | |
| proposed at Albany, OR for use by KHPE at; | | | | | |
| NL: 44-38-25, WL: 123-16-25 | | | | | |
| KLDZ | LIC 278C1 | Medford | OR 239.64 | 253.3 | 209.0 30.64 |
| KSYCFM | LIC 280C1 | Yreka | CA 247.23 | 234.0 | 209.0 38.23 |
| KWPKFM | LIC 281C2 | Sisters | OR 155.05 | 325.1 | 105.0 50.05 |
| RADD | ADD 277C | Alturas | CA 157.40 | 183.3 | 105.0 52.40 |
| AL280 | VAC 280C1 | Weiser | ID 294.82 | 56.9 | 209.0 85.82 |

Exhibit E, Figure 1

CERTIFICATE OF SERVICE

I certify that on this 2nd day of June, 2005, I caused to be sent by U.S. mail, postage prepaid, copies of the foregoing Reply Comments to the following:

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c/o Steven Seward
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Suite 600
Seattle, Washington 98101-1670

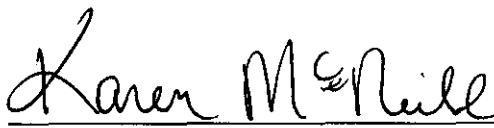
Cumulus Licensing Corp.
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Karen McNeill

*Via Hand Delivery